

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LER 9004-1(b)

Ronald I. LeVine
210 River Street Ste. 210
Hackensack, NJ 07601

In Re:

THERESA WOLF

Case No.: 16-19775RG

Judge: Gambardella

Chapter: 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION

The debtor in this case opposes the following (choose one):

1. ☒ Motion for Relief from the Automatic Stay filed by Lakeview Loan Servicing creditor,

A hearing has been scheduled for November 16, 2016, at 10:30.

- ☐ Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for _____, at _____.

- ☐ Certification of Default filed by _____.

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons (choose one):

- ☐ Payments have been made in the amount of \$ _____, but have not been accounted for. Documentation in support is attached.

☒ Payments have not been made for the following reasons and debtor proposes

repayment as follows (explain your answer):

I sent my first payment to my Chapter 13 attorney who forwarded to the foreclosure attorney for Cenlar Kivitz McKeever 7 Lee, P.C. on June 1, 2016 for \$3,626.00. I subsequently also sent payments to Cenlar directly which were also not cashed. By error I did not realize that the checks were not cashed in until this motion was received. I utilized the funds in my checking account for other

(attached)
Exhibit A

☒ Other (explain your answer):

expenses in the mean time. I am able to drop off a \$3,626.00 payment to my attorney by November 15th, and make another payment of that amount before the end of November. The remaining balance of post petition arrears I request be rolled into my Chapter 13 Plan. Normal payments will resume on with December's payment.

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: 11/11/2016

/s/Theresa Wolf

Debtor's Signature

Date: 11/11/2016

Theresa Wolf

Debtor's Signature

NOTES:

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.

*The Law Office
of*
Ronald I. LeVine

RONALD I. LeVINE
ROBERT WACHTEL
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June 1, 2016

Kivitz, McKeeever, Lee, P.C.
Sentry Office Plaza
216 Haddon Avenue, Suite 406
Westmont, NJ 08108

Re: Theresa Wolf, Debtor
Chapter 13 Case No.: 16-19775RG

To Whom It May Concern:

We represent debtor, Theresa Wolf in the above matter. Pursuant to her Chapter 13 Plan, enclosed please find payment to Cenlar in the amount of \$3,626.00. Please forward to your client and provide us with the Cenlar address for future payments.

Should you have any questions please feel free to call this office.

Very truly yours,

Alyssa Gouveia
Bankruptcy Paralegal

Enc.
cc: Theresa Wolf

EXHIBIT
A